

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

AVIDYNE CORPORATION,)	
a Delaware corporation,)	
)	
Plaintiff/Counter-Defendant,)	
v.)	Civil Action No. 05-11098 GAO
)	
L-3 COMMUNICATIONS AVIONICS)	
SYSTEMS, INC., f/k/a B. F. GOODRICH)	
AVIONICS SYSTEMS, INC., a)	
Delaware corporation,)	
)	
Defendant/Counter-Plaintiff)	
)	

DEFENDANT'S IDENTIFICATION OF CLAIM INTERPRETATIONS

Defendant, L-3 Communications Avionics Systems, Inc. submits the following chart of claim terms and corresponding definitions that comprise Defendant's proposed interpretation of terms from the Independent Claims 1 and 16 of U.S. Patent No. 5,841,018:

INDEPENDENT PATENT CLAIMS	CLAIM TERMS FOR INTERPRETATION	L-3 PROPOSED DEFINITIONS
CLAIM 1:		
1. a method of <i>compensating for installation orientation of an attitude determining device</i> on-board a mobile craft with respect to a reference coordinate system of said craft to obtain <i>attitude</i> information of said craft from said device <i>based on an earth frame coordinate system</i> , said method comprising the steps of:	<p>Compensating for installation orientation of an attitude determining device</p> <hr/> <p>Attitude</p> <hr/> <p>Attitude Determining Device</p> <hr/> <p>Earth Frame Coordinate System</p>	<p>Adjusting to neutralize the effect of the orientation of an attitude determining device as installed.</p> <hr/> <p>The angular orientation of a craft relative to a frame of reference, such as the amount of tilting about the wings and body of an aircraft relative to the earth.</p> <hr/> <p>A piece of equipment that determines angular orientation relative to the earth frame and is used to establish the attitude of a craft.</p> <hr/> <p>A theoretical frame of reference defined by the earth's surface and a vertical axis that is in the direction of gravity (perpendicular to the earth's surface).</p>

INDEPENDENT PATENT CLAIMS	CLAIM TERMS FOR INTERPRETATION	L-3 PROPOSED DEFINITIONS
	Based on an earth frame coordinate system	Relative to a theoretical frame of reference defined by the earth's surface and a vertical axis that is in the direction of gravity (perpendicular to the earth's surface.)
<i>installing</i> said attitude determining device on-board said mobile craft <i>at an unknown orientation with respect to said reference coordinate system of said craft</i> ;	Reference coordinate system of said craft: _____ With respect to a reference coordinate system _____ Installing _____ At an unknown orientation: _____ At an unknown orientation with respect to said reference coordinate system of said craft	A theoretical frame of reference that is defined on the craft. _____ Relative to a theoretical frame of reference that is defined on the craft. _____ To place or mount. _____ At an orientation that is not precisely known. _____ The attitude determining device is installed in the craft at an orientation that is not precisely known.
<i>sensing the installation orientation of said attitude determining device with respect to said earth frame coordinate system when said craft is at rest to obtain a static orientation measurement of said device</i> ;	At rest _____ Static orientation measurement: _____ To obtain a static orientation measurement _____ Sensing the installation orientation of said attitude determining device with respect to said earth frame coordinate system when said craft is at rest to obtain a static orientation measurement of said device	Not moving. _____ An angular orientation arrived at by the attitude determining device when the craft is not moving. _____ Obtaining an angular orientation arrived at by the attitude determining device when the craft is not moving. _____ Detecting angular orientation information with the installed attitude determining device relative to the earth while the craft is not moving to arrive at an angular orientation.

<i>measuring an attitude</i> of said mobile craft with said attitude determining device; and	Measuring an attitude	Using the attitude determining device to measure an angular orientation.
<i>compensating said craft attitude measurement of said device with said static orientation measurement to obtain attitude information of said craft's reference coordinate system with respect to said earth frame coordinate system.</i>	Compensating said craft attitude measurement of said device with said static orientation measurement to obtain attitude information of said craft's reference coordinate system with respect to said earth frame coordinate system	Using the static orientation measurement in some manner to mathematically adjust for a difference between the device's measurement of the craft's orientation and the craft's orientation relative to the earth.
CLAIM 16:		
16. A method of <i>compensating for installation orientation of an attitude determining device</i> on-board a mobile craft with respect to a reference coordinate system of said craft to obtain <i>attitude</i> information of said craft from said device <i>based on an earth frame coordinate system</i> , said method comprising the steps of:	<p>Compensating for installation orientation of an attitude determining device</p> <hr/> <p>Attitude</p> <hr/> <p>Attitude Determining Device</p> <hr/> <p>Earth Frame Coordinate System</p> <hr/> <p>Based on an earth frame coordinate system</p>	<p>Adjusting to neutralize the effect of the orientation of an attitude determining device as installed.</p> <hr/> <p>The angular orientation of a craft relative to a frame of reference, such as the amount of tilting about the wings and body of an aircraft relative to the earth.</p> <hr/> <p>A piece of equipment that determines angular orientation relative to the earth frame and is used to establish the attitude of a craft.</p> <hr/> <p>A theoretical frame of reference defined by the earth's surface and a vertical axis that is in the direction of gravity (perpendicular to the earth's surface).</p> <hr/> <p>Relative to a theoretical frame of reference defined by the earth's surface and a vertical axis that is in the direction of gravity (perpendicular to the earth's surface.)</p>

<p><i>installing</i> said attitude determining device on-board said mobile craft <i>at an unknown orientation with respect to said reference coordinate system of said craft;</i></p>	<p>Reference coordinate system of said craft:</p> <hr/> <p>With respect to a reference coordinate system</p> <hr/> <p>Installing</p> <hr/> <p>At an unknown orientation:</p> <hr/> <p>At an unknown orientation with respect to said reference coordinate system of said craft</p>	<p>A theoretical frame of reference that is defined on the craft.</p> <hr/> <p>Relative to a theoretical frame of reference that is defined on the craft.</p> <hr/> <p>To place or mount.</p> <hr/> <p>At an orientation that is not precisely known.</p> <hr/> <p>The attitude determining device is installed in the craft at an orientation that is not precisely known.</p>
<p><i>sensing the installation orientation of said attitude determining device with respect to said earth frame coordinate system when said craft is at rest to obtain a static orientation measurement of said device;</i></p>	<p>At rest</p> <hr/> <p>Static orientation measurement:</p> <hr/> <p>To obtain a static orientation measurement</p> <hr/> <p>Sensing the installation orientation of said attitude determining device with respect to said earth frame coordinate system when said craft is at rest to obtain a static orientation measurement of said device</p>	<p>Not moving.</p> <hr/> <p>An angular orientation arrived at by the attitude determining device when the craft is not moving.</p> <hr/> <p>Obtaining an angular orientation arrived at by the attitude determining device when the craft is not moving.</p> <hr/> <p>Detecting angular orientation information with the installed attitude determining device relative to the earth while the craft is not moving to arrive at an angular orientation.</p>
<p><i>storing said static orientation measurement in a memory;</i></p>	<p>Storing said static orientation measurement in a memory</p>	<p>Maintaining static orientation measurement data in some form within the attitude determining device.</p>
<p><i>measuring an attitude</i> of said mobile craft with said attitude determining device;</p>	<p>Measuring an attitude</p>	<p>Using the attitude determining device to measure an angular orientation.</p>

<i>retrieving said static orientation measurement from said memory to a processor of said device; and</i>	Retrieving said static orientation measurement from said memory to a processor of said device	Providing the data representative of the static orientation measurement to an electronic computational device within the attitude determining device.
<i>compensating said craft attitude measurement with said retrieved static orientation measurement in said processor to obtain attitude information of said craft's reference coordinate system with respect to said earth frame coordinate system.</i>	Compensating said craft attitude measurement with said retrieved static orientation measurement in said processor Compensating said craft attitude measurement with said retrieved static orientation measurement in said processor to obtain attitude information of said craft's reference coordinate system with respect to said earth frame coordinate system	Using the data representative of the static orientation measurement in some manner in an electronic computational device of the attitude determining device to mathematically adjust the device's measurement of the craft's orientation. Using the data representative of the static orientation measurement in some manner in an electronic computational device of the attitude determining device to mathematically adjust for a difference between the device's measurement of the craft's orientation and the craft's orientation relative to the earth.

Respectfully submitted,

L-3 COMMUNICATIONS AVIONICS
SYSTEMS, INC.

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/s/ Terence J. Linn

Brendan M. Hare, BBO No. 221480

Kathleen A. Kelley, BBO No. 562342

Hare & Chaffin

160 Federal Street

Boston, Massachusetts 02110

(617) 330-5000

Terence J. Linn

Karl T. Ondersma

Van Dyke, Gardner, Linn & Burkhart, LLP

2851 Charlevoix Drive, S.E.

PO Box 888695

Grand Rapids, Michigan 49588-8695

(616) 975-5500